

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

QJR, LLC,

Plaintiff

Versus

CASE NO 1:24-cv-00383-TBM-RPM

SECURIX, LLC, and  
JONATHAN MILLER, INDIVIDUALLY  
AND AS CHAIRMAN OF SECURIX LLC,

Defendants

**DEFENDANTS' OPPOSITION TO REMAND**

COME NOW Defendants SECURIX, LLC, and JONATHAN MILLER,  
INDIVIDUALLY AND AS CHAIRMAN OF SECURIX LLC, and oppose Plaintiff's Motion to  
Remand for the reasons fully stated in the Memorandum in opposition and exhibits attached in  
support, Exhibit A, Declaration of Jonathan Miller.

Respectfully submitted, this the 17<sup>th</sup> day of January, 2025.

SECURIX, LLC and  
JONATHAN MILLER, individually and  
as Chairman of SECURIX, LLC

/s/ Albert R. Jordan, IV

ALBERT R. JORDAN, IV

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**CERTIFICATE OF SERVICE**

I certify that on January 17, 2025 I electronically filed the foregoing document(s) and that they are available for viewing and downloading from the Court's CM/ECF system, and that the participants in the case that are registered CM/ECF users will be served electronically by the CM/ECF system.

/s/ Albert R. Jordan, IV  
ALBERT R. JORDAN, IV